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## EXHIBIT 1

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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**VERSUS TECHNOLOGY, INC.,**
**Plaintiff,****v.****RADIANCE, INC.****Defendant.****Civil Action No. 04-1231 (SLR)**

**PLAINTIFF'S RESPONSES TO DEFENDANT'S  
FIRST SET OF REQUESTS FOR ADMISSION**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff, Versus Technology, Inc. ("Versus"), issues the following Responses to Defendant, Radianse, Inc.'s ("Radianse"), First Set of Interrogatories.

**REQUEST NO.1**

Versus, PTFM, and Alan C. Heller entered into an agreement effective as of January 31, 1997, by which PTFM licensed certain of its technology to Versus (the "PTFM Agreement"). A copy of the PTFM Agreement is attached hereto as Exhibit A

**RESPONSE**

Admitted.

**REQUEST NO.2**

Under the PTFM Agreement, Versus is a licensee of U.S. Patents No. 5,572,195 (the "'195 patent") and U.S. Reissue Patent No. 36,791 (the "'791 patent").

**RESPONSE**

Admitted that Versus is the exclusive licensee of U.S. Patent No. 5,572,195 and U.S.

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Reissue Patent No. 36,791. Otherwise denied.

**REQUEST NO.3**

Subsequent to the execution of the PTFM Agreement, title to the '195 and the '791 patents was assigned by PTFM to Freshloc.

**RESPONSE**

Admitted.

**REQUEST NO.4**

The '195 and '791 patents are owned by Freshloc.

**RESPONSE**

Admitted.

DATED: March 25, 2005

By: s/ James M. Lennon

George Pazuniak (DE #478)

Gerard M. O'Rourke (DE #3265)

James M. Lennon (DE #4570)

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*Attorneys for plaintiff, Versus Technology, Inc.*

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**CERTIFICATE OF SERVICE**

I, James M. Lennon, hereby certify that on this 25th day of March, 2005, I caused a true and correct copy of the foregoing to be served upon the persons indicated below in the manner so indicated:

**Via Hand-Delivery and E-Mail (jingersoll(S).vcst.com):**

Josy W. Ingersoll (#1088)  
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**Via E-Mail (spr(%lahive.com):**

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Attorneys for Defendant, Radianse, Inc.

s/ James M. Lennon  
James M. Lennon (DE #4570)

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## EXHIBIT 2

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## **EXHIBIT 3**

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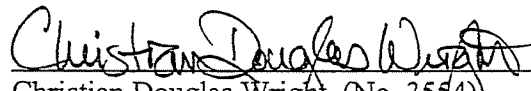
**CERTIFICATE OF SERVICE**

I, Christian Douglas Wright, hereby certify that on May 12, 2005, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

George Pazuniak, Esquire  
Connolly Bove Lodge & Hutz LLP  
The Nemours Building  
1007 N. Orange Street  
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I further certify that on May 12, 2005, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record.

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